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10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 MATTHEW WHITE,

17 Defendant.

18 CR 19-253 RSL
19 NO.

20 INFORMATION

21 The United States Attorney charges that:

22 **COUNT 1**
23 (Wire Fraud)

24 A. The Scheme and Artifice to Defraud

25 1. Beginning in 2011, and continuing until about August 2018, in Skagit
26 County, within the Western District of Washington, and elsewhere, MATTHEW WHITE
27 did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain
28 money by means of material false and fraudulent pretenses, representations, and promises
and concealment of material facts, as set forth below.

29 2. The essence of the scheme to defraud was to secure investor funds by
30 claiming investment expertise and success he did not possess, then conceal the true

1 use of investor funds by sending false account statements to his victims. WHITE
 2 received well over a million dollars from family and other acquaintances to invest on
 3 their behalf, then pooled their money in his personal bank and trading accounts. Though
 4 he sent investors monthly statements purporting to show regular trading activity and
 5 steady profits, WHITE actually made very few trades, earned no net profits, and used
 6 customer money for his own personal expenses.

7 **B. Manner and Means of the Scheme and Artifice to Defraud**

8 3. It was part of the scheme and artifice to defraud that, between 2011 and
 9 2018, WHITE solicited and received approximately \$1.29 million from victim investors
 10 in Florida and Washington for the purpose of trading commodity futures contracts, first
 11 under his own name and later under the company name M.W. Global Futures LLC
 12 (“MWGF”). At all relevant times, WHITE was the sole officer or employee of MWGF.

13 4. It was further part of the scheme and artifice to defraud that, to secure
 14 investor funds, WHITE held himself out to be a skilled commodities trader and
 15 distributed promotional materials that advertised his training and qualifications. For
 16 example, he touted himself to potential investors as “a full time Commodities Trader
 17 specializing in trading the U.S. Treasury Bonds” and claimed to have “received formal
 18 professional training from a proprietary trading firm based in Chicago, IL.” He also
 19 claimed to be a member of the Chicago Board of Trade. None of these claims was true.

20 5. It was further part of the scheme and artifice to defraud that those
 21 promotional materials also falsely claimed that MWGF provided a high return on
 22 investment when compared to other investment options, stating, “On average, M.W.
 23 Global Futures LLC makes roughly 10% more annually than an investment in a common
 24 fund and is on par with the S&P 500.”

25 6. It was further part of the scheme and artifice to defraud that, once in
 26 possession of investors’ funds, WHITE would send investors monthly statements
 27 purporting to show the trading activity undertaken on their behalf and the resulting gain
 28 or loss for each trading day, as well as a summary of the beginning and ending monthly

1 balance and overall monthly profit. These statements, sent either through the U.S. mail
 2 or by electronic mail, falsely represented that WHITE engaged in trading every month,
 3 his trading was profitable, and investors were earning positive returns on their
 4 investments.

5 7. It was further part of the scheme and artifice to defraud that, in monthly
 6 statements for months in which WHITE did trade, he significantly inflated the amount of
 7 profits earned. The false account statements, which led victims to believe that their
 8 investments were earning substantial profits, induced victims to deposit additional funds
 9 with WHITE and MWGF.

10 8. It was further part of the scheme and artifice to defraud that these fabricated
 11 monthly statements did not reflect WHITE's actual trading activity, which was far less
 12 active and far less profitable than he represented on the statements. WHITE's true
 13 brokerage account showed that he made small, infrequent trades, and instead transferred
 14 at least a portion of the funds provided by the victims for investment to his own personal
 15 bank account to use for daily living expenses.

16 **C. Execution of the Scheme and Artifice to Defraud**

17 9. On or about the date set forth below, in Skagit County, within the Western
 18 District of Washington, and elsewhere, MATTHEW WHITE, having devised the above-
 19 described scheme and artifice to defraud, for the purpose of executing this scheme and
 20 artifice, did knowingly transmit and cause to be transmitted by wire communication in
 21 interstate and foreign commerce the below-listed representative writings, signs, signals,
 22 pictures, and sounds:

Count	Date	Wire Transmission
24 1	September 1, 25 2016	Email attaching fabricated monthly trading statement 26 sent from MATTHEW WHITE in Florida to C.C. in 27 Washington State

28 All in violation of Title 18, United States Code, Section 1343.

1 **ASSET FORFEITURE ALLEGATION**

2 The allegations contained in Count 1 of this Information are hereby re-alleged and
3 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the
4 offense contained in Count 1, the Defendant MATTHEW WHITE shall forfeit, to the
5 United States, all property constituting or traceable to proceeds of the offense. All such
6 property is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), by
7 way of Title 28, United States Code, Section 2461(c), and includes but is not limited to a
8 sum of money reflecting the proceeds the Defendant obtained from the offense.

9 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
10 any act or omission of the Defendant,

11 1. cannot be located upon the exercise of due diligence;
12 2. has been transferred or sold to, or deposited with a third party;
13 3. has been placed beyond the jurisdiction of the Court;
14 4. has been substantially diminished in value; or,
15 5. has been commingled with other property which cannot be divided without
16 difficulty;

17 it is the intent of the United States, pursuant to Title 21, United States Code, Section
18 853(p), to seek the forfeiture of any other property of the Defendant up to the value of the

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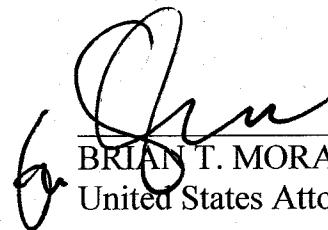
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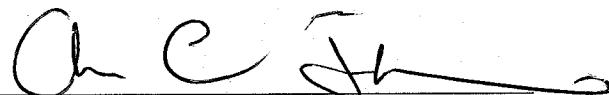
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1 above-described forfeitable property.

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3 DATED: December 9, 2019

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5 
6 BRIAN T. MORAN
7 United States Attorney

8 
9 ANDREW C. FRIEDMAN
10 Assistant United States Attorney

11 
12 BENJAMIN T. DIGGS
13 Special Assistant United States Attorney